



000001

217/782-6760

Refer To: L2010300018/Winnebago Co.  
IPC (Roto Rooter)  
Superfund/Technical

Date: July 18, 1991

Mr. Paul R. Steadman  
United States Environmental  
Protection Agency  
Region 5  
230 S. Dearborn Avenue  
Chicago, Illinois 60604

EPA Region 5 Records Ctr.



243457

Subject: USEPA Request for IEPA ARAR's on Immediate Removal Activities.

Dear Mr. Steadman:

I have been instructed to respond to your July 11, 1991, request to James Janssen, for IEPA Applicable or Relevant and Appropriate Requirements (ARAR's). A search for ARAR's for removal activities outlined within your request was conducted and set forth in this letter. Based on the content of your letter, it was difficult to assess given specifics of the removal and how they may relate to IEPA ARAR's; however, based on IEPA's prior involvement with this site, and discussions previously held with USEPA/EERB, I feel the following ARAR's should adequately cover all removal activities.

IEPA assumes that the removal activities outlined within your unilateral order are similar or the same as those outlined within the prior Administrative Order on Consent. If this is the case, IEPA anticipates five (5) medias/areas to be sampled prior to removal.

- 1) Waste oils within underground and above ground tanks;
- 2) Sludges within those tanks;
- 3) Visually contaminated soils around the tanks;
- 4) Sludges and oil stained surface soils adjacent to buildings, cyanide incinerator foundation and lagoon area.
- 5)\* Residential garbage, building debris and miscellaneous trash located on top of the lagoon area. (This material would have to be removed in order to cap the lagoon).

\* This trash will most likely be special waste and not need analysis performed unless the lagoon soils are characteristically hazardous.

All five waste areas described above will be regulated by the Resource Conservation and Recovery Act, (IEPA delegated program), which is defined within the Illinois Environmental Protection Act, (ACT). Within the ACT, RCRA wastes are further defined in:

TITLE 35: ENVIRONMENTAL PROTECTION  
SUBTITLE G: WASTE DISPOSAL  
CHAPTER I: POLLUTION CONTROL BOARD  
VOLUMES I THROUGH IV

I am sure you are somewhat familiar with Subtitle G based upon your past removal experiences within the state of Illinois. Obviously, not all Parts of Subtitle G will be applicable as an ARAR to this particular situation; however, any activities related to regulated wastes generated, stored at or removed from this site are required to

comply with subtitle G. The following listed Parts of Subtitle G are focused for this removal action. Parts of Subtitle G which are not mentioned which may be applicable to this site due to unforeseen circumstances, shall not be considered waived.

1) Waste removed from this site will fall in two categories, Characteristically Hazardous Waste and Special Waste. Both wastes are defined in Subtitle G, Parts 721 and 808 respectively. Since IEPA and USFWS are currently unaware of listed wastes at the site, wastes removed will need to be characterized in accordance with Section 721.103, "Definition of Hazardous Waste", and Subpart C of Part 721, "Characteristics of Hazardous Waste".

2) Hazardous Waste will be identified in accordance with the following Sections:  
721.121, Characteristic of Ignitability, (flashpoint of less than 140 degrees fahrenheit as determined by ASTM standards D-93-79, D-93-80 and D-3278-78). D001 EPA Hazardous Waste Number.

721.122, Characteristic of Corrosivity, (pH of  $\leq 2.0$  or  $\geq 12.5$ ), test methods are defined within this section. D002 EPA Hazardous Waste Number.

721.123, Characteristic of Reactivity, (this may be an issue with cyanide and sulfides located on site). D003 EPA Hazardous Waste Number.

721.124, Toxicity Characteristic, (TCLP), all wastes to be removed from site shall be subject to TCLP in accordance with test method 1311 in SW 846. EPA Hazardous Waste Numbers range from D004 - D043.

3) Hazardous Wastes generated from IPC shall be subject to Subtitle G, Part 722, "Standards Applicable To Generators Of Hazardous Waste".

4) Hazardous Waste Transporters shall be subject to Subtitle G, Part 723, "Standards Applicable to Transporters of Hazardous Waste".

5) Hazardous Waste receiving facility will be subject to Subtitle G, Part 721, "Standards For Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities".

6) Due to the State of Illinois recognizing this site as an unpermitted, illegally operating Hazardous Waste Storage Facility through IEPA's identification of Hazardous Wastes being stored on site in November of 1989, this site shall be subject to Subtitle G, Part 725, "Interim Status For Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities". Particular attention should be focused on the following sections:

725.211, "Closure Performance Standard".

725.214, "Disposal or Decontamination of Equipment, Structures and Soils.

Subpart J., "Tank Systems"; 725.297, "Closure and Post Closure Care", with particular attention to paragraphs a) and b).

7) All remaining wastes to be removed from this site shall be subject to Subtitle G, Part 808, "Special Waste Classifications", and Part 809, "Special Waste Hauling".

Procedures for collecting soil samples and analysis for VOA's are presented within IEPA Administrative Policy #7, (see attachment). Wastes currently stored at IPC shall be subject to the described analytical testing procedures outlined within these Sections before transported off-site for disposal or storage.

It is recommended by IEPA/RCRA to use a sampling device known as a bacon bomb when collecting samples. Samples collected should be no more than the length of the sampling apparatus when descending down into the tanks. Samples should not be collected from the valve located on the west side of the above ground storage tank for it will not give a representative sample from the tank.

The oil/water phase separating and sampling approach is not recommended due to the uncertainty and variability of the actual sampling procedures and removal of each separate liquid phase within the tanks. Also, due to the duration of the phased sampling and removal, it would not be conducive for achieving an expedited removal activity, (within 45 days).

IEPA recommends that all analysis be expedited for turnaround with the PRP's utilizing USEPA approved CLP Lab.

If you have any questions concerning the contents of this letter, please do not hesitate to contact me at 217/782-3335.

Sincerely;



Scott R. Moyer  
Federal Sites Management Unit  
Remedial Project Management Section  
Division of Land Pollution Control

attachments:

cc: John Breslin, esq., USEPA/ORC  
Bernard Schorle, USEPA (5HS-11)  
James Jan~~a~~sen, P.E., Manager IEPA/RPMS  
Kurt Neibergall, IEPA/FSMU  
Terry Ayers, IEPA/FSMU  
Paul Jagiello, esq., IEPA/DLC (Maywood)  
Robert Watson, IEPA/RCRA  
Dave Retzlaff, IEPA/LPC (Rockford)



**Title:**

**Technical Policy #7**  
**Soil Volatile Sampling Procedures**

**Purpose:** To identify requirements for standardizing the soil sampling procedures used to determine if Agency set clean-up objectives have been met. Results vary depending on the sampling method and procedure used to take the soil samples. In order to ensure consistency in the soil sampling procedures used when volatile constituents are in question at clean-ups (RCRA, Voluntary, SRAPL, NPL, LUST, etc.) the following procedures have been developed.

**Procedure:**

- A. PREPARATION AND DECONTAMINATION OF SOIL SAMPLER (i.e. STAINLESS STEEL, BRASS, BRONZE, COPPER, etc.). An example of these samplers would be a shelby tube, split-barrel sampler with metal tube inserts or california sampler. These are only examples there maybe more types available. Also, the sample tube must be at least six inches long.
- \*1. Wash tubing or sampler with hot water and a nonfoaming detergent.
  - 2. Rinse with hot water.
  - \*3. Rinse with a solvent, such as hexane or acetone.
  - 4. Rinse with very hot water to drive off solvent.
  - 5. Rinse with deionized distilled water.
  - 6. Air Dry
  - 7. Store the sampler in aluminum foil until ready for use.
- \*Consult the laboratory for specific recommendations.
- B. SOIL SAMPLING FOR VOLATILE ORGANICS
- 1. Using a properly decontaminated sampler (refer to preparation and decontamination instructions), push or drive the sampler to obtain a representative soil sample.
  - 2. DO NOT remove sample from sample tube in the field. The laboratory should remove the sample from the sampling tube.



3. Immediately add clay or other cohesive material (i.e. wetted bentonite) to the ends of the sample to eliminate head space, if necessary.
4. Cover both ends of the sampler with aluminum foil. If possible, cover the aluminum foil with a cap.
5. Put the sample in storage at 4 degrees centigrade immediately.
6. Transport the samples to the laboratory as soon as possible. Most laboratories require delivery within 24 hours of sampling.

**NOTE:**

- A. Soil samples which will be tested for volatile organic constituents cannot be composited because of the volatilization which would result from any compositing method.
- B. If after attempting this procedure in sand or gravelly soils with no success. An alternate procedure maybe used with prior approval from the responsible section.

**Programs Affected:** - Permit Section  
- Field Operations Section  
- Remedial Project Management Section  
- Leaking Underground Tank Section

**Written By:** Committee: Steve Davis, RPMS  
December 17, 1990 Sherry Otto, FOS  
Gary Reside, RPMS  
G. Tod Rowe, Permits  
Angela Tin, LUST